



UNIVERSITY of PENNSYLVANIA

Information Systems and Computing, Networking & Telecommunications

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November 28, 2006

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, DC 20554

Re: Reply Comments, WC Docket No. 02-60

Dear Ms. Dortch:

I am writing in response to the comments of Internet2, Arizona State University and the University of Louisville to likewise support the Commission's decision to fund connections to only the Internet2 backbone as part of its pilot program to develop a nationwide broadband network dedicated to health.

MAGPI is a regional high performance network and a GigaPoP (Gigabit Point of Presence) run by the University of Pennsylvania. In addition to serving as the Internet2 connector for the University of Pennsylvania, MAGPI is currently the point of aggregation for network traffic from 447 institutions across Pennsylvania, New Jersey and Delaware. Many of these research and education institutions (which include hospitals, K12s, higher education, and corporate research and development) are located in rural areas, and they depend on MAGPI and Internet2 as their primary method of accessing resources and educational content that would otherwise be physically or financially unattainable. It has been our first objective to extend the benefits of advanced networking as deeply into these remote areas as possible, thereby increasing the number of opportunities available to communities in education, health care, research, and economic development.

A significant portion of our success in bringing advanced networking to rural areas has been the result of carefully chosen strategic relationships that have developed over the past seven years. The first to accept the fledgling MAGPI as a partner was Internet2, and since that time they have been the guiding force behind our efforts, with a qualified staff across diverse fields and a responsive and capable support structure. Although we have since established our own identity within the region, our foundation is still based on Internet2 principles that are still in effect today.

MAGPI made the decision not to connect to National Lambda Rail over a year ago based on many factors, including the following:

- NLR does not provide staff members who support technical innovations in health care.
- NLR is too expensive for our rural communities to afford.
- NLR focuses primarily on serving high end research institutions, making it an impractical choice for smaller institutions both in terms of capacity availability and the cost of electronics.
- Internet2 is a truly national backbone that is more than capable of meeting our communications needs beyond our three states, thereby alleviating any need for a second advanced network connection.

It would therefore provide our region with no benefit whatsoever to include NLR in the program. It would actually be harmful, since we do not interface with NLR at any point and therefore our 447 institutions would be unable to reach any pilot program participants that connect solely to NLR's network, except possibly through the insufficiently secure and insufficiently reliable commodity Internet.

Sincerely

A handwritten signature in cursive script that reads "Gregory D. Palmer". The signature is fluid and elegant, with a large initial 'G' and a long, sweeping underline.

Gregory D. Palmer
MAGPI Executive Director
University of Pennsylvania